

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARIO PILLCO MOROCHO, et al.,
Plaintiffs

Civil Action No:

V.

1:22-10652-WGY

BRISTOL COUNTY SHERIFF'S OFFICE, et al.,
Defendants.

Joint Motion to Extend Deadlines

Now come both parties and move this Honorable Court to extend the scheduling deadlines set in the Court's order of October 13, 2022 (Order ECF 16) for a period of ninety days (90) and state as reasons the following:

1. The parties have conferred concerning a joint scheduling order as directed by this Court in its October 13th Order. ECF 16.
2. In conferring, the parties discuss the following:
 - a. The present administration at the Bristol County Sheriff's Office will be changing on January 3, 2022, with a newly elected Sheriff assuming office.
 - b. Counsel for the Bristol County Sheriff's Office will be replaced by new counsel at that time and will need time to become familiar with this case and be appointed as Special Assistant Attorney Generals by the incoming Massachusetts Attorney General.
 - c. That the process for a and b is estimated to take several weeks.

For these reasons the Parties request the Court to extend all deadlines including the trial date and deadline for a joint scheduling order for a period of ninety (90) days to allow new counsel for Bristol County to take over the matter and to confer on a schedule with new counsel.

Respectfully submitted,

Defendants Bristol County Sheriff's Office
Sheriff Thomas Hodgson and
Superintendent Steven Souza

By their attorney,

/s/ Bruce A. Assad
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Plaintiffs,

By their attorneys,

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